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October 23, 2024

VIA ECF

The Honorable Arun Subramanian, U.S.D.J.

U.S. District Court for the Southern District of New York

500 Pearl Street

New York, New York 10007

Re: Van Duser et al. v. Tozzer LTD., et al., 1:23-cv-09329 (AS)

Dear Judge Subramanian:

This firm represents the Plaintiffs. With Defendants' consent, we respectfully request the following extensions of the Court's April 25, 2024 (Doc. No. 33) Scheduling Order:

- Deposition deadline be extended from October 26, 2024 to December 20, 2024;
- Deadline to complete all discovery is extended from November 1, 2024 to December 26, 2024; and
- Deadline to serve post-discovery summary judgment motions shall be extended from November 22, 2024 to January 16, 2025, with the deadline for answering papers extended to February 13, 2025, and deadline for reply papers extended to March 6, 2025.

The parties request this extension to allow for additional time to coordinate the approximately 15 depositions. This request will not affect any other dates or deadlines. We appreciate the Court's consideration of this request.

Respectfully submitted,  
LIPSKY LOWE LLP

s/ Douglas B. Lipsky  
Douglas B. Lipsky

CC: Counsel of Record (Via ECF)